

ORIGINAL

INTERVENTION



0000125302

BEFORE THE ARIZONA CORPORATION COMMISSION

RECEIVED

COMMISSIONERS

2011 MAY 17 P 3:53

Arizona Corporation Commission

DOCKETED

GARY PIERCE – Chairman

BOB STUMP

AZ CORP COMMISSION
DOCKET CONTROL

MAY 17 2011

SANDRA D. KENNEDY

PAUL NEWMAN

BRENDA BURNS

DOCKETED BY

MM

IN THE MATTER OF THE APPLICATION OF
SOUTHWEST GAS CORPORATION FOR THE
ESTABLISHMENT OF JUST AND REASONABLE
RATES AND CHARGES DESIGNED TO
REALIZE A REASONABLE RATE OF RETURN
ON THE FAIR VALUE OF ITS PROPERTIES
THROUGHOUT ARIZONA.

Docket No. G-01551A-10-0458

**MOTION FOR LEAVE TO
INTERVENE OF NATURAL
RESOURCES DEFENSE COUNCIL**

Pursuant to the Rules of Practice and Procedure of the Arizona Corporation Commission

("Commission"), Natural Resources Defense Council ("NRDC") hereby moves for leave to intervene
in the above-captioned docket based on the following grounds:

1. NRDC is a non-profit public NRDC is a national environmental organization that combines
the grassroots power of 1.3 million members and online activists with the expertise of more than 350
lawyers, scientists and other professionals. NRDC uses law, science, and grassroots support to protect
the planet's wildlife and wild places and to ensure a safe and healthy environment for all living
things. NRDC tackles state-based, national and international issues through our offices in New York,
San Francisco, Santa Monica, Washington D.C., Chicago and Beijing.

2. NRDC members and supporters live in Arizona and have an interest in increased development
of energy efficiency programs and related incentives and disincentives to maximizing energy
efficiency. Thus, NRDC has a substantial interest in this proceeding because Southwest Gas'
proposal significantly impacts energy efficiency.

3. Intervention by NRDC will not unduly broaden the issues or delay this proceeding.

1 4. NRDC requests that all pleadings, correspondence, discovery and other documents be served
2 on the following:

3 Laura E. Sanchez
4 NRDC
5 PO Box 287
6 Albuquerque, NM 87103
7 (505) 352-7408 (Tel/Fax)
8 lsanchez@nrdc.org

9 Street address should be sent to:

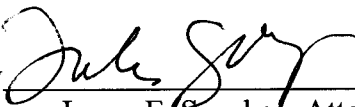
10 Laura E. Sanchez
11 NRDC
12 5736 Valle Alegre NW
13 Albuquerque, NM 87120

14 5. NRDC's counsel above is pending bar admission in Arizona, and will separately file a Motion
15 to Associate Counsel Pro Hac Vice, to request admission as counsel for NRDC in this matter.

16 WHEREFORE, NRDC respectfully requests that the Commission issue an order granting its
17 Motion for Leave to Intervene in the above-captioned proceeding.

18 RESPECTFULLY SUBMITTED this 16th day of May, 2011.

19 NATURAL RESOURCES
20 DEFENSE COUNCIL

21 By 
22 Laura E. Sanchez, Attorney
23 P.O. Box 287
24 Albuquerque, NM 87103

25 ORIGINAL Fedexed to and 14 COPIES of the
26 foregoing filed this 16th day of
27 May, 2011 to:

28 Docketing Supervisor
Docket Control
Arizona Corporation Commission
1200 W. Washington
Phoenix, AZ 85007

COPIES of the foregoing
Electronically mailed this
16th day of May, 2011 to:

Debra S. Gallo
Southwest Gas Corporation

Justin Lee Brown
Southwest Gas Corporation

Daniel Pozefsky
RUCO

Michael W. Patten
Roshka, DeWulf & Patten, PLC
Tucson Electric Power Co.

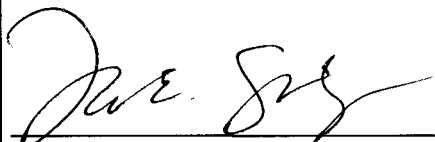
Timothy M. Hogan
Arizona Center for Law in the Public Interest
Southwest Energy Efficiency Project

Michael M. Grant
Arizona Investment Council

Cynthia Zwick

Janice Alward
Legal Division
Arizona Corporation Commission

Steve Olea
Director, Utilities Division
Arizona Corporation Commission



Laura E. Sanchez, Attorney for NRDC